

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re:)
)
) **CASE NO. 16-16733-mdc**
Francisco Rosario, Jr.)
) **JUDGE Magdeline D. Coleman**
) **And**
Siomaira Rosario)
) **Debtors**
)

**NEWREZ LLC d/b/a SHELLPOINT MORTGAGE SERVICING NOTICE OF
DEBTOR’S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor NewRez LLC d/b/a Shellpoint Mortgage Servicing (“Creditor”), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor’s request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 06/01/2020. Creditor holds a secured interest in real property commonly known as 64 Hillside Ave, Huntingdon Valley, Pennsylvania 19006 as evidenced by claim number 16-1 on the court’s claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 07/01/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance

arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

**Robertson, Anschutz, Schneid & Crane
LLC**

Attorney for Secured Creditor
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Charles G. Wohlrab, Esquire
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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 26th day of October 2020:

**Francisco Rosario, Jr.
64 Hillside Avenue
Huntingdon Valley, PA 19006**

**Siomaira Rosario
64 Hillside Avenue
Huntingdon Valley, PA 19006**

And via electronic mail to:

**MICHAEL A. CATALDO2
Cibik & Cataldo, P.C.
1500 Walnut Street
Suite 900
Philadelphia, PA 19102**

**WILLIAM C. MILLER, Esq.
Chapter 13 Trustee
P.O. Box 1229
Philadelphia, PA 19105**

**United States Trustee
Office of the U.S. Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106**

By: /s/Amelia Mixon
Amelia Mixon
Email: amixon@rascrane.com